



CLOSURE SOLUTIONS, INC.

December 13, 2005

Ms. Catherine E. Kuhlman, Executive Officer
California Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, Suite A
Santa Rosa, California 95403

**Subject: Cleanup and Abatement Order No. R1-2005-099
Former Boyett Petroleum Service Station
171 Santa Rosa Avenue
Santa Rosa, California 95404
NCRWQCB File No. 1TSR018**

Dear Ms. Kuhlman,

On behalf of Boyett Petroleum, this letter is being submitted to you to discuss Item G of the Cleanup and Abatement Order No. R1-2005-099 issued against the Former Boyett Petroleum Service Station located at 171 Santa Rosa Avenue, in Santa Rosa, California. Item G requires the complete installation of the final groundwater extraction system associated with the groundwater cut off wall and creek discharge abatement by December 15, 2005.

In accordance with the North Coast Regional Water Quality Control Board's (NCRWQCB's) requirements, an Interim Groundwater Extraction system was implemented by Kleinfelder Inc. in January, 2004 to provide abatement of groundwater contaminant discharge to Santa Rosa Creek. A full report documenting the operational results of the Interim Groundwater Extraction system will be submitted to the NCRWQCB by December 15, 2005, as required by Cleanup and Abatement Order Item F.

Preliminary results of the operation of the Interim Groundwater Extraction system indicate that an estimated 706 grams of gasoline range hydrocarbons was extracted during the period from January through July, 2004. Based on these results and the expected run-time necessary to fully effect creek discharge abatement, **Boyett Petroleum proposes ozone-sparging as a more effective remedial alternative to of groundwater extraction.**

This remedial alternative is proposed for the following reasons:

- 1) The system is expected to be as effective, if not more effective, than groundwater extraction at achieving creek discharge abatement;

- 2) The system operation lifetime is expected to be significantly lower than groundwater extraction; and,
- 3) An in-situ ozone sparge curtain would not induce migration of the nearby PCE plume associated with the Empire Cleaner's facility, located across Sonoma Avenue to the southwest

Boyett Petroleum and members of the NCRWQCB have scheduled a meeting on December 27th, 2005 to discuss the proposed remedial alternative and develop an implementation schedule for the proposed work. Because of this, Boyett Petroleum formally requests an extension on Item G of the Cleanup and Abatement Order until a schedule can be agreed upon during the meeting.

If you have any questions, please feel free to contact me at (925) 348-0656, or Ms. Jessica Holcombe (Boyett Petroleum) at (209) 577-6000.

Sincerely,

CLOSURE SOLUTIONS, Inc.



Ronald D. Chinn, P.E.
Principal Engineer

cc: Jessica Holcombe, Boyett Petroleum
Bradley Erskine, Kleinfelder, Inc.
Matthew G. Dudley, Sedgwick, Detert, Moran & Arnold, LLP
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